

AO 91 (Rev 8/01) Criminal Complaint

## United States District Court

SOUTHERN

DISTRICT OF  
McALLEN DIVISION

TEXAS

UNITED STATES OF AMERICA

V.

United States Courts  
Southern District of Texas

CRIMINAL COMPLAINT

FILED

Case Number: M-21-2349-M

VIRIDIANA ESCOBEDO (USC) *November 05, 2021*

Nathan Ochsner, Clerk of Court

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my

knowledge and belief. On or about 11/04/2021 in Hidalgo County, inthe Southern District of Texas the defendant(s)

(Track Statutory Language of Offense)

21 USC 841 - Possession with Intent to Distribute Cocaine, approximately 16 kilograms, a schedule II controlled substance.

in violation of Title 21 United States Code, Section(s) USC 841I further state that I am a(n) DEA Special Agent and that this complaint is based on the following facts:

See attached affidavit.

Continued on the attached sheet and made a part of this complaint:

X Yes No

Approved by: AUSA Alexis Garcia

~~Submitted by reliable electronic means~~, sworn to and attested *in person*  
~~to telephonically per Fed. R. Cr. P. 41, and~~ probable cause found on:

/s/ Paul Bayliss

Signature of Complainant

November 5, 2021 - *10:03 a.m.*

Paul C. Bayliss

DEA Special Agent

Juan F. Alanis, U.S. Magistrate Judge

Name and Title of Judicial Officer

Signature of Judicial Officer

Attachment A

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Paul Charles Bayliss, being duly sworn, state:

1. I am a Special Agent with the Drug Enforcement Administration (DEA) and have been so employed October 2019. I am currently assigned to the McAllen District Office in McAllen, Texas. My current responsibilities include the investigation of federal drug offenses under Title 21 of the United States Code (U.S.C.).

**SUBJECT FOR WHOM CRIMINAL COMPLAINT IS SOUGHT**

1. This affidavit is submitted in support of a criminal complaint alleging that Viridiana Escobedo (ESCOBEDO) has violated 21 U.S.C. §841 (a)(1). I base this affidavit on my personal knowledge and on information provided to me by other law enforcement officers.

**PROBABLE CAUSE**

1. In July 2020, I and SA Jamie Mitchell of Texas Department of Public Safety Criminal Investigation Division initiated an investigation into a cocaine trafficking organization after the seizure of 48 kilograms of cocaine. Throughout this investigation, numerous co-conspirators have been identified within this cocaine trafficking organization to include ESCOBEDO. On November 4, 2021, ESCOBEDO, who was driving a red Nissan Murano registered in her name, entered the United States from Mexico through the Hidalgo Port of Entry and was subsequently sent for secondary inspection. During the secondary inspection, United States Customs Agents discovered 17 bundles, approximately 16 kilograms, of cocaine concealed within a compartment in the rear of the red Nissan Murano. During field testing of the cocaine, Agents discovered 3

Attachment A

additional baggies of cocaine freebase, approximately 14.6 grams, wrapped inside 3 of the cocaine bundles, one in each of the three bundles. In accordance with DEA policies, the cocaine and cocaine freebase will be sent to a DEA Laboratory for testing.

2. ESCOBEDO was questioned at the Hidalgo Port of Entry. Prior to questioning, ESCOBEDO was read her Miranda Warnings and signed a waiver of rights form indicating she was willing to speak with Agents. ESCOBEDO denied all knowledge of the cocaine discovered in the red Nissan Murano. During questioning, ESCOBEDO stated that she maintained possession of the red Nissan Murano and did not let anyone else have control of the red Nissan Murano while she was in Mexico. After questioning was concluded, ESCOBEDO was transported to the McAllen District Office and was processed per DEA policies. After processing, ESCOBEDO was transported to the East Hidalgo Detention Facility in La Villa, TX.

3. \*\*\*

**CONCLUSION**

Based on the foregoing, I believe there is probable cause to believe that Viridiana ESCOBEDO has conspired to Possess with Intent to Distribute a Controlled Substance in violation of Title 21 U.S.C. §841(a)(1).